

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

<b>POLICE NO. :</b>	18-072755
<b>PROSECUTOR NO. :</b>	095448718
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>TANISHIA N. SHANNON</b>	)	
<b>6630 Indiana Ave</b>	)	<b>CASE NO. 1916-CR</b>
<b>Kansas City, MO 64130</b>	)	<b>DIVISION</b>
<b>DOB: 10/24/1980</b>	)	
<b>Race/Sex: B/F</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Murder 2nd Degree (565.021-001Y19840904.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the **class A felony of murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about September 19, 2018, in the County of Jackson, State of Missouri, the defendant, with the purpose of causing serious physical injury to Ashley Thomas, caused the death of Ashley Thomas by stabbing her.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

**Count II. Armed Criminal Action (571.015-001Y19755212.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about September 19, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree, charged

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in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Murder in the Second Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, made a part hereof and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

*/s/ Katherine Baker Nelson*  
Katherine Baker Nelson (#62733)  
Assistant Prosecuting Attorney  
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**WITNESSES:**

1. DET Leland W. Blank, 1125 Locust, Kansas City, MO 64106
2. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106

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4. DET Timothy M. Fitzgerald, 1125 Locust, Kansas City, MO 64106
5. DET Wayne C. Fitzner, 1125 Locust, Kansas City, MO 64106
6. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
7. DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106
8. PO Alyssa Stuedle, 1125 Locust, Kansas City, MO 64106
9. Ashley D. Thomas, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 10-16-2018

CRN: 18-72755

I, Detective K. Oldham # 5166 (Name and identify law enforcement officer, or person having information as probable cause.)

knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

I have probable cause to believe that on 10-16-2018, at 6630 Indiana Av in (Date) (Address)

Kansas City, Jackson Missouri Tanishia A. Shannon (County) (Name of Offender(s))

B/F, 10-24-1980 committed one or more criminal offense(s). (Description of Identity)

The facts supporting this belief are as follows:

On 9-19-2018 at 1902 hours, Kansas City, Missouri Police Officers were dispatched to 6630 Indiana on a disturbance. Upon arrival officers were met outside the house by the suspect, Shannon and the victim. The victim appeared to have a puncture wound to her chest and was transported to a local hospital where she died due to her injury. The Shannon told the responding officer that the victim had come to her house looking for her boyfriend. The victim was let into the house by her son and then got into an argument then a fight with her, during which she stabbed the victim with a knife.

Shannon was transported to Police Headquarters, advised of her Miranda rights and agreed to speak to detectives. Shannon stated that she lives at 6630 Indiana Av and was home with her two children making lasagna when she heard her oldest son talking to someone at the front door. She heard her son invite this person in at which time Shannon saw that it was the victim, Ashley Thomas. The victim came into the house and was looking for Shannon's brother "Mann" (the victim's boyfriend). Shannon advised that she did not know where he was. Shannon stated that the victim was worked up and angry and kept insisting that Shannon was helping hide the brother inside the house.

Shannon told the victim her brother was not in the house and after a few minutes asked the victim to leave. During this time the victim became upset with Shannon and started physically fighting her. Shannon and the victim began to mutually fight. Shannon described them as pulling each other's hair, punching, and kicking each other. Shannon believed the fight lasted for approximately 20 or more minutes. During the fight Shannon stated she yelled to her oldest son telling him to call 911. Shannon stated that at one point the fight was in the kitchen of the house. The victim had Shannon pinned against the sink not allowing her to move. Shannon started reaching for nearby objects to hit the victim with at which point she thought she grabbed a steak like knife and started waving her hands around. Shannon did not think she hit the victim with the knife and stated the fighting continued back through the main level of the house and towards the front door with the knife still in her right hand.

Shannon stated that she attempted to get to the stairs so she could run up to the upstairs and get to her phone but the victim would stop her and pull her back down. Finally when the two of them were near the open front door Shannon was able to grab the door frame and push the victim out of the house with her feet immediately shutting the door behind her. The police arrived and the victim ran towards them yelling. Police then approached and arrested Shannon. Shannon advised that she did not know the victim had been cut until the police told Shannon. Shannon stated the victim has never stayed at her house. She also advised she has never had an altercation with the victim before this incident. During the interview detectives noted multiple scratches and bruises on Shannon's

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upper body and marks around her neck. Shannon advised that she had also noticed her front teeth were loose and her back was sore.

Shannon advised she never walked out of her front door and attacked or punched the victim while she was sitting in a chair. Shannon clarified that she did not exit the house after getting the victim out until the police arrived and officers approached the house. I also asked Shannon if she ever verbally threatened the victim. If she ever stated she was going to put a hole in her head. Shannon stated no. Shannon advised that at no point when she was at or near the front door did she have the knife in her hand. I asked if the victim was ever sitting in the chairs she has outside of her front door on her front patio area. Shannon stated the victim was sitting in one of those chairs when the police arrived. Shannon believed it was approximately 1-3 minutes from the time she shut the victim out of the house and the time the police arrived. Shannon also stated that when she finally gets the victim out of her house she notices Brian standing in the front yard. She also notices Brian talking to the police once they arrive.

During the interview detectives showed Shannon a single photograph of a knife found in Shannon's kitchen sink. Shannon reviewed the photograph and stated that she thought that was the knife she had grabbed during the altercation.

Witness #1 advised he was sitting on the front porch of his girlfriend's residence which is directly across the street from the suspect's residence. The victim and her boyfriend were sitting outside talking when "all of a sudden"; the victim got up and went inside the residence. The witness stated he could hear banging on the walls and could tell people were fighting inside the residence. The front door opened and the witness could see the victim and the suspect on the ground inside the residence fighting. He stated the fighting went on for approximately thirty or forty minutes. The witness advised it looked like the victim was "getting the best of" the suspect and that at one point the victim was on top of the suspect. The witness advised he thought the victim and suspect were going to come through the front window at one point. The fighting stopped and the victim came outside of the residence. The suspect came to the open door and stated, "You touch my window, and I'll put one right in your head."

The victim sat in one of two red chairs on the front porch. The suspect's brother, (boyfriend to the victim) came outside and sat in a wheel chair which was in the front yard of the residence. The victim and suspect continued to have words and the suspect was stating, "I got bank, I got racks and racks of money, you ain't got nothing, this is my real hair, that's why I snatched your wig out of your head." The suspect was calling the victim, "broke ass."

The witness advised the victim had been sitting in the chair on the front porch for approximately five minutes before the suspect came to the open front doorway. The witness advised that just prior to stabbing the victim the suspect stated, "You don't know me bitch, you don't know who the fuck I am!" The suspect then walked over to the victim and stabbed her in the chest. The victim yelled, "This bitch just stabbed me!" The victim jumped up to try to get at the suspect but the suspect ran in the house and shut the front door. The victim's boyfriend grabbed the victim's clothing in an effort to get the victim to stop trying to go after the suspect. Approximately one minute after the victim was stabbed; the police arrived on the scene.

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The victim walked up the street toward the police car. The witness stated the victim talked to the police for approximately two minutes and then fell to the ground. The witness advised the suspect was standing in the doorway to the residence with the knife for a minute prior to the stabbing. He advised the knife did not seem that big and appeared to be a steak knife. The witness stated the "little boys" who are the suspect's children, were throwing the victim's things out into the front yard and running in and out of the house. He advised that neither of the children were outside when the stabbing took place.

The witness stated he has no affiliation with either the victim or the suspect. The suspect opened the front door and stated, "She attacked me, she attacked me!" The witness stated that he thought, "How can someone attack you when they are sitting in a chair?" He stated, "That wasn't right, she didn't have to stab that girl." He stated that he never saw the victim with any weapon. The witness advised that he heard from another neighbor that the victim and suspect had been staying at the residence for the past week prior to the homicide but he was unaware how long or if they had been staying there.

On 10-18-2018, the listed suspect, Shannon responded to Police Headquarters to provide a second follow-up statement. Shannon recounted the events and added that she believed that her brother, Steven Shannon, AKA "Kabrawn Minor" AKA "Man", was outside her residence, setting in his wheelchair while the fight between her and the victim took place inside her residence. She advised that she did not remember Steven attempting to break up the fight or coming inside the residence. She was unable to explain why she would not have talked about Steven being outside the residence and a witness to the disturbance at the time of her first interview. Shannon denied ever exiting the residence and approaching the victim and specifically denied stabbing the victim while she (the victim) sat on the front porch.

Shannon confirmed that she observed this neighbor was sitting on his front porch after she pushed the victim outside of her residence. Shannon confirmed that she was yelling at the victim through the closed screen door calling her a "broke ass bitch."

Printed Name K. Oldham # 5166 Signature /S/ Det K. Oldham # 5166

The Court finds probable cause and directs the issuance of a warrant this \_\_\_\_\_ day of \_\_\_\_\_.

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.